

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

JACQUELINE WASHINGTON § DOCKET NO.: 5:23-CV-01623-SMH-MLH
VERSUS § JUDGE S. MAURICE HICKS, JR.
BROOKSHIRE GROCERY COMPANY § MAGISTRATE JUDGE MARK L. HORNSBY

RESPONSE TO REMOVAL ORDER

NOW INTO COURT, through undersigned counsel, comes **BROOKSHIRE GROCERY COMPANY**, who, in response to the Removal Order of this Court dated November 16, 2023, represents as follows:

1.

A. A list of all attorneys involved in the case and the parties they represent is as follows:

Mr. Murphy J. White
Ms. Adrienne D. White
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Attorneys for plaintiff, Jacqueline Washington

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Attorneys for defendant, Brookshire Grocery Company

- B. There are no other documents in the state court record excluding documents which were previously attached to the Notice of Removal.
- C. The following is a list of all documents included in the state court record, arranged by order of filing date:

TITLE OF PLEADING	DATE PLEADING WAS FILED
Petition for Damages on behalf of Jacqueline Washington	10/31/23

- D. Undersigned counsel hereby certifies that the above constitutes the entire state court record.

2.

There were no motions or exceptions pending in the State Court at the time of removal.

3.

No funds are being held by the state court in the registry of the court for the benefit of the litigants.

4.

All counsel in this case are admitted to practice before this Court.

Respectfully submitted,

LUNN IRION LAW FIRM LLC

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Fax: (318) 220-3265
Email: jam@lunnirion.com

By: /s/ James A. Mijalis
JAMES A. MIJALIS
Bar No. 17057
ATTORNEYS FOR DEFENDANTS, BROOKSHIRE
GROCERY COMPANY

CERTIFICATE

I HEREBY CERTIFY that on November 21, 2023, a copy of the foregoing *Response to Removal Order* was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Mr. Murphy J. White and Ms. Adrienne D. White by operation of the court's electronic filing system.

/s/ James A. Mijalis
OF COUNSEL